

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND FACSIMILE

April 22, 2016

The Honorable Frank Maas  
United States District Court for the S.D.N.Y.  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 740  
New York, NY 10007-1312

**MEMO ENDORSED**

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

In accordance with Your Honor's directions on the record at the March 22, 2016 hearing, plaintiffs are providing Your Honor with items for consideration of plaintiffs' "particularized showing" that disclosure of the original source of documents produced to plaintiffs' counsel would place that source at risk of bodily injury, including death. Consistent with Your Honor's direction during that hearing, Plaintiffs request Your Honor's permission to have the documents filed with the Court "under seal" with copies served on Eric Lewis, Esq., at Lewis Baach PLLC, who have litigated the issue for defendants MWL/IIRO for "Attorneys' Eyes Only" review.

Respectfully,

Robert T. Haeefe  
ROBERT T. HAEFELE  
PLAINTIFFS' EXECUTIVE COMMITTEES

cc: The Honorable George B. Daniels (via Facsimile)  
Eric Lewis, Esq. (via electronic mail)  
All Counsel of Record (Via ECF)

So ordered  
Fellows,  
USDC,  
4/26/16

